

### **REMARKS**

The claims have not been amended. The specification has been amended to correct certain informalities. Accordingly, claims 1-13 are currently pending in the application, of which claims 1, 8, and 11 are independent.

Applicants respectfully submit that the above amendments do not add new matter to the application and are fully supported by the specification.

Applicants respectfully request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

#### ***Rejections Under 35 U.S.C. § 103***

To establish an obviousness rejection under 35 U.S.C. § 103(a), four factual inquiries must be examined. The four factual inquiries include (a) determining the scope and contents of the prior art; (b) ascertaining the differences between the prior art and the claims in issue; (c) resolving the level of ordinary skill in the pertinent art; and (d) evaluating evidence of secondary consideration. *Graham v. John Deere*, 383 U.S. 1, 17-18 (1966). In view of these four factors, the analysis supporting a rejection under 35 U.S.C. 103(a) should be made explicit, and should "identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements" in the manner claimed. *KSR Int'l. Co. v. Teleflex, Inc.*, 127 S. Ct. 1727, 82 USPQ2d 1385, 1396 (2007). Furthermore, even if the prior art may be combined, the combination must disclose or suggest all of the claim limitations. See *in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Assuming *arguendo* that the prior art elements could be combined, the combined prior art elements do not disclose or suggest every claimed feature.

Claims 1-3 and 11 and stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent Application Publication No. 2005/0083344 applied for by Higgins ("Higgins") in view of U.S. Patent Application Publication No. 2005/0062756 applied for by Dyke, *et al.* ("Dyke"). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 1 recites, *inter alia*:

a signal converting unit selecting a corresponding white scaling factor of the white scaling factors stored in the storing unit based on a white scaling signal from an external, converting the three color image signals into the four color image signals based on the selected white scaling factor and outputting the converted four color image signals

Higgins in view of Dyke fails to teach or suggest such features. Although the Office Action relies upon Dyke to cure the deficiencies of Higgins, Dyke also fails to teach such features. Dyke discloses that "display controller 120 of FIG. 3, may receive color data from external device 124," which may be a digital camera, a video decoder, a MPEG decoder, etc. (paragraph [0026]). Thus, the external device 124 of Dyke provides color data rather than a white scaling signal. And the color space conversion module 130-1 converts a format associated with the data from external device 124 so that display controller 120 may operate on the data (paragraph [0026]). Thus, Dyke fails to disclose or suggest "a white scaling signal from an external."

Even if the external device 124 provided a white scaling signal, Dyke would still fail to cure the deficiency of Higgins because Dyke is silent regarding "selecting a corresponding white scaling factor of the white scaling factors stored in the storing unit based on a white scaling signal from an external." Rather, as noted above, Dyke discloses that "color space conversion module 130-1 converts a format associated with the data from external device 124 so that display controller may operate on the data" (paragraph [0026]). Although Dyke teaches converting color formats, Dyke does not teach "a signal converting unit selecting a corresponding white scaling factor of the white scaling factors stored in the storing unit based on

a white scaling signal from an external.” Therefore, Higgins in view of Dyke fails to teach each and every feature of claim 1.

Similarly, Higgins in view of Dyke fails to teach or suggest each and every feature of claim 11.

Claims 4-10 and 12-13 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Higgins in view of Dyke and further in view of U.S. Patent Application Publication No. 2003/0151694 applied for by Lee, *et al.* (“Lee”). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 8 recites, *inter alia*:

reading a white scaling signal from an external;  
selecting a corresponding white scaling factor of the white scaling factors based on the read white scaling signal

Higgins in view of Dyke fails to teach or suggest such features. Although the Office Action relies upon Dyke to cure the deficiencies of Higgins and Lee, Dyke also fails to teach such features. For at least the reasons noted above regarding claim 1, Dyke does not teach “reading a white scaling signal from an external” and “selecting a corresponding white scaling factor of the white scaling factors based on the read white scaling signal.” Therefore, Higgins in view of Dyke and Lee fails to teach or suggest each and every feature of claim 8.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 1, 8, and 11. Claims 2-7 depend from claim 1 and are allowable at least for this reason. Claims 9 and 10 depend from claim 8 and are allowable at least for this reason. Claims 12 and 13 depend from claim 11 and are allowable at least for this reason. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests

all the features of the claimed invention, Applicants respectfully submit that independent claims 1 and 11, and all the claims that depend therefrom, are allowable.

### **CONCLUSION**

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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